

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	No. 4:20-cr-00805-HEA-PLC
	)	
THOMAS T. TAYLOR,	)	
	)	
Defendant.	)	

**SUPPLEMENTAL MOTION FOR PRETRIAL DETENTION AND HEARING**

Comes now the United States of America, by and through its Attorneys, Saylor A. Fleming, United States Attorney for the Eastern District of Missouri, and Donald S. Boyce, Assistant United States Attorney for said District, and moves the Court to order Defendant detained pending trial, and further requests that a detention hearing be held three (3) days from the date of Defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, §3141, et seq.

As and for its grounds, the United States of America states as follows:

1. Defendant is charged with Interference with Interstate Commerce by Robbery, in violation of 18 U.S.C. §1951(a). Pursuant to Title 18, United States Code, Section 4142(f)(1)(A), this case involves charges of robbery, which is a crime of violence, and the rebuttable presumption of detention applies.

2. The investigation by the Bureau of Alcohol, Tobacco, Firearms & Explosives, with multiple local police departments, has shown that between March 2020 and August 29, 2020, the Defendant, Thomas T. Taylor, was involved in at least 38 incidents of theft of cartons of cigarettes from various gas station convenience stores in St. Louis and St. Charles Counties. In some of the incidents, the Defendant stole the cigarettes without threatening the clerk. In some of the incidents,

especially those where the clerk challenged him, the Defendant would threaten force. On July 28, 2020, the Defendant went into the Circle K in Bridgeton and went behind the counter. When the clerk said he couldn't be back there, the Defendant rushed the clerk and said, "do you want to get shot?" The Defendant took 29 cartons of cigarettes. After he was arrested, The Defendant was shown a picture from the incident. The Defendant admitted that he was the person pictured and that he had committed the robbery. On August 16, 2020, the Defendant and an accomplice went into the Zephyr Express in South County and went behind the counter. The clerk said he couldn't be behind the counter, and again the Defendant said the clerk was "gonna get shot." The Defendant took 2 cartons of cigarettes. On August 29, 2020, the Defendant went back to the same ZX, and the clerk recognized him and called the police. Police chased the Defendant and eventually arrested him. Police conducted a show up, and the clerk identified the Defendant as the robber from August 16. The Defendant was taken to the St. Louis County jail, where he was interviewed multiple times by various local PD's and by ATF. The Defendant admitted his role in the robberies and thefts and stated that he has a major drug problem and was stealing cigarettes and reselling them at a market in North County to get money for drugs.

3. Based on the statutory factors in 18 U.S.C. § 3142(g), detention is appropriate in this case. Pursuant to Section 3142(g)(1), the nature and circumstances of this case are that the Defendant has been charged with crimes of violence. Pursuant to Section 3142(g)(2), the weight of the evidence against the Defendant, as summarized above, is strong. Pursuant to Section 3142(g)(3), it appears that the Defendant has at least ten prior felony convictions.

WHEREFORE, the United States requests this Court to order Defendant detained prior to trial, and further to order a detention hearing three (3) days from the date of Defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING  
United States Attorney

/s/ Donald S. Boyce  
DONALD S. BOYCE, #6282562IL  
Assistant United States Attorney